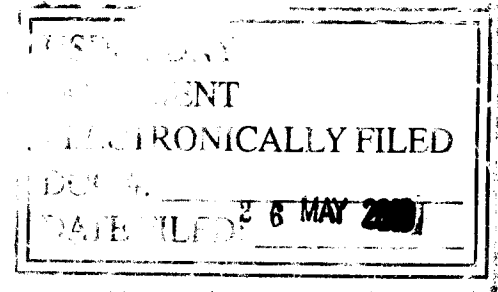


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

- v. -

INDICTMENT

AMADOU O. SQUARE,  
DJIEDJOM WILSON,  
a/k/a "Aboubacar Saidou,"  
PIERRE COFFI,  
WALTER UFOT,  
MOHAMED L. BARRY,  
a/k/a "Barry,"

10 CRIM 461

Defendants.

COUNT ONE

(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

1. From at least in or about January 2009, up to and including on or about May 26, 2010, in the Southern District of New York and elsewhere, AMADOU O. SQUARE, DJIEDJOM WILSON, a/k/a "Aboubacar Saidou," PIERRE COFFI, WALTER UFOT, and MOHAMED L. BARRY, a/k/a "Barry," the defendants, and others known and unknown, unlawfully, willfully, and knowingly, combined, conspired, confederated, and agreed together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that AMADOU O. SQUARE, DJIEDJOM WILSON, a/k/a "Aboubacar Saidou," PIERRE COFFI, WALTER UFOT, and MOHAMED L. BARRY, a/k/a

"Barry," the defendants, and their co-conspirators, unlawfully, willfully, and knowingly would and did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions by means of false and fraudulent pretenses, representations and promises.

OVERT ACTS

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about February 24, 2009, DJIEDJOM WILSON, a/k/a "Aboubacar Saidou," the defendant, deposited a check into an account maintained at Citizens Bank.

b. On or about April 30, 2009, PIERRE COFFI, the defendant, negotiated a check drawn on a bank account maintained at Sovereign Bank.

c. On or about April 27, 2009, a co-conspirator not named herein ("CC-1") met with a confidential source ("CS-1") in New York, New York and provided CS-1 with several checks

that CC-1 had obtained from, among others, AMADOU O. SQUARE and WALTER UFOT, the defendants.

d. On or about April 6, 2010, MOHAMED L. BARRY, the defendant, traveled to a branch of TD Bank.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

4. As a result of committing the conspiracy to commit bank fraud offense alleged in Count One of this Indictment, in violation of Title 18, United States Code, Section 1349, AMADOU O. SQUARE, DJIEDJOM WILSON, a/k/a "Aboubacar Saidou," PIERRE COFFI, WALTER UFOT, and MOHAMED L. BARRY, a/k/a "Barry," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting or derived from proceeds obtained directly or indirectly as a result of the offense alleged in Count One of this Indictment.

Substitute Asset Provision

If any of the property described above, as a result of any act or omission of the defendants:

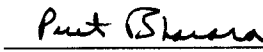
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of AMADOU O. SQUARE, DJIEDJOM WILSON, a/k/a "Aboubacar Saidou," PIERRE COFFI, WALTER UFOT, and MOHAMED L. BARRY, a/k/a "Barry," the defendants, up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1349; Title 21 United States Code, Section 853; and Title 28 United States Code, Section 2461.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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Defendants.

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INDICTMENT

(18 U.S.C. § 1349.)

(18 U.S.C. §§ 982, 1349; 21 U.S.C. § 853;  
28 U.S.C. § 2461.)

PREET BHARARA

United States Attorney.

A TRUE BILL

*Sherry Beckman*  
Foreperson.

*May 26, 2010*

*Indictment filed*

*Case assigned to Judge Presta.*

*Exeman, USMJ*